COHEN / PLACITELLA / ROTH PC

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October 15, 2013

The Honorable Noel L. Hillman U.S. District Court for the District of NJ Mitchell H. Cohen Building & U.S. Courthouse 4th & Cooper Streets Room 1050 Camden, NJ 08101

RE: Susan Doherty, et. al. v. The Hertz Corporation, et. al. Civil Action No. 1:10-ev-00359

Dear Judge Hillman:

Following today's hearing I was reminded of something that I had forgotten, but feel that in full candor to the Court want to call to your attention. That is, Plaintiff Dwight Simonson 's daughter is married to Matthew Lee, Esquire, a former associate attorney of Mr. Dunn, co-class counsel. He was employed by Mr. Dunn at the time Mr. Dunn was retained by Mr. Simonson and as well as at the time Mr. Simonson's original suit was filed. Subsequently, he left Mr. Dunn's firm's employ. At the time he left the firm, Mr. Simonson was given the option to have his matter transferred to Mr. Lee's new firm or continue on with Mr. Dunn. Mr. Simonson elected to continue on with Mr. Dunn. Since the time Mr. Lee changed firms he has had no involvement in this matter.

If Your Honor has any questions regarding this matter, we are available at the Court's convenience.

Respectfully Yours,

Michael Coren

Co-counsel for Plaintiffs

MC/qjg

cc: All counsel of record